

<p>Attorney or Party Name, Address, Telephone &amp; FAX Nos., State Bar No. &amp; Email Address</p> <p>Samuel A. Newman (SBN 217042) sam.newman@sidley.com Genevieve G. Weiner (SBN 254272) gweiner@sidley.com SIDLEY AUSTIN LLP 555 West Fifth Street Los Angeles, CA 90013 Telephone: 213.896.6000 Facsimile: 213.896.6600</p> <p><input type="checkbox"/> Individual <i>appearing without an attorney</i> <input checked="" type="checkbox"/> Attorney for: Interested Party Richard Saghian</p>	<p>FOR COURT USE ONLY</p>
<p style="text-align: center;"><b>UNITED STATES BANKRUPTCY COURT CENTRAL DISTRICT OF CALIFORNIA - CENTRAL DIVISION</b></p>	
<p>In re:</p> <p>CRESTLLOYD, LLC,</p> <p style="text-align: right;">Debtor and Debtor-in-Possession.</p>	<p>CASE NO.: 2:21-bk-18205-DS CHAPTER: 11</p> <p><b>NOTICE OF LODGMENT OF ORDER IN BANKRUPTCY CASE RE: <i>(title of motion<sup>1</sup>)</i>: ORDER TO SHOW CAUSE WHY MARIO ANDRE SMITH SHOULD NOT BE HELD IN CONTEMPT OF COURT</b></p>

PLEASE TAKE NOTE that the order titled **ORDER TO SHOW CAUSE WHY MARIO ANDRE SMITH SHOULD NOT BE HELD IN CONTEMPT OF COURT** was lodged on August 12, 2022 and is attached. This order relates to the motion which is docket number 395.

<sup>1</sup> Please abbreviate if title cannot fit into text field.

**ATTACHMENT**

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Richard Saghian, an Individual

**UNITED STATES BANKRUPTCY COURT**

**CENTRAL DISTRICT OF CALIFORNIA**

**LOS ANGELES DIVISION**

In re	)	Case No. 2:21-bk-18205-DS
	)	
CRESTLLOYD, LLC,	)	Chapter 11
	)	
Debtor and Debtor-in-Possession.	)	Assigned to: The Hon. Deborah J. Saltzman
	)	
	)	<b>[PROPOSED] ORDER TO SHOW CAUSE</b>
	)	<b>WHY MARIO ANDRE SMITH SHOULD</b>
	)	<b>NOT BE HELD IN CONTEMPT OF</b>
	)	<b>COURT</b>
	)	
	)	<u>Hearing:</u>
	)	Date: _____
	)	Time: _____
	)	Place: Courtroom 1639
	)	255 E. Temple St.
	)	Los Angeles, CA 90012
	)	<b>VIA ZOOMGOV ONLY</b>
	)	

On August 12, 2022, Crestlloyd, LLC, the chapter 11 debtor and debtor in possession in the above-captioned matter (the “Debtor”) and Mr. Richard Saghian (“Mr. Saghian” or the “Buyer”, and collectively with the Debtor, the “Movants”), the purchaser of the real property formerly owned by the Debtor located at 944 Airole Way, Los Angeles, CA 90077 (the “Property”), filed the *Buyer’s and Debtor’s Notice of Motion and Joint Motion (I) to Enforce the Sale Order, and (II) for Issuance of an Order to Show Cause Why Andre Mario Smith Should Not Be Held in Contempt of Court* (the “Motion”).

The Motion alleges that Mr. Andre Mario Smith (“Mr. Smith”) has recorded a fraudulent quitclaim deed purporting to transfer the Property to himself in direct violation of the *Order Granting Debtor’s Motion: (1) Approving the Sale of the Property Free and Clear of All Liens, Claims, Encumbrances, and Interests with the Exception of Enumerated Exclusions; (2) Finding That the Buyer Is a Good Faith Purchaser; (3) Authorizing and Approving the Payment of Certain Claims from Sale Proceeds; (4) Waiving the Fourteen-Day Stay Period Set Forth in Bankruptcy Rule 6004(h), and (5) Providing Related Relief* [Dkt. 247] (the “Sale Order”). Pursuant to Rule 9020-1(c)(2)(B) of the Local Bankruptcy Rules of the United States Bankruptcy Court for the Central District of California (the “Local Rules”), Mr. Smith is hereby notified that such conduct may be grounds for sanctions.

Upon consideration of the Motion and all papers and evidence submitted in support thereof, and for good cause shown,

**IT IS HEREBY ORDERED THAT:**

1. Mr. Smith shall appear before this Court at a hearing at \_\_\_\_ [a./p.]m. on \_\_\_\_\_, 2022 at the above-referenced location (the “Hearing”) to show cause, if any, why the Court should not enter an order adjudging Mr. Smith to be in civil contempt of court for his violation of the Sale Order.
2. On or before \_\_\_\_\_, 2022, Mr. Smith shall file and serve a written explanation, if there is an explanation, why he should not be held in contempt of court for the alleged violations of the Sale Order. At the Hearing, the Court may treat as true any uncontroverted facts established by declaration and limit testimony to controverted facts only.



## PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is:  
Sidley Austin LLP, 555 West Fifth Street, Los Angeles, CA 90013

A true and correct copy of the foregoing document entitled: **NOTICE OF LODGMENT OF ORDER IN BANKRUPTCY CASE** will be served or was served **(a)** on the judge in chambers in the form and manner required by LBR 5005-2(d); and **(b)** in the manner stated below:

**1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF):** Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On August 12, 2022, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

☒ Service information continued on attached page

**2. SERVED BY UNITED STATES MAIL:** On August 12, 2022, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

Andre Mario Smith  
7938 Broadway No. 1263, Lemon Grove, CA 91946

☐ Service information continued on attached page

**3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL** (state method for each person or entity served): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on August 12, 2022, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

Andre Mario Smith  
7938 Broadway No. 1263, Lemon Grove, CA 91946  
Email: andmarioith@yahoo.com

☐ Service information continued on attached page

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

August 12, 2022      Pamela Santos  
Date                      Printed Name

/s/Pamela Santos  
Signature

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(Via NEF)**

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